

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re LEHMAN BROTHERS SECURITIES
AND ERISA LITIGATION

This Document Applies To:

*In re Lehman Brothers Equity/Debt
Securities Litigation, 08-CV-5523-LAK*

Case No. 09-MD-2017 (LAK)

ECF CASE

**LEAD PLAINTIFFS' NOTICE OF MOTION
FOR CLASS CERTIFICATION AND APPOINTMENT
OF CLASS REPRESENTATIVES AND CLASS COUNSEL**

PLEASE TAKE NOTICE that, upon the accompanying (1) Memorandum of Law in Support of Motion for Class Certification and Appointment of Class Representatives and Class Counsel and (2) the Declaration of David R. Stickney and attached exhibits, Lead Plaintiffs Alameda County Employees' Retirement Association, the Government of Guam Retirement Fund, the Northern Ireland Local Government Officers' Superannuation Committee, the City of Edinburgh Council as Administering Authority of the Lothian Pension Fund, and the Operating Engineers Local 3 Trust Fund, by and through the undersigned attorneys, hereby move this Court, in Courtroom 12D of the Daniel Patrick Moynihan United States Courthouse, 500 Pearl Street, New York, New York, at a date and time to be set by the Court, pursuant to Rules 23(a), 23(b)(3), and 23(g) of the Federal Rules of Civil Procedure, for an Order:

1. Certifying this case as a class action on behalf of the following class:

All persons and entities who purchased or otherwise acquired Lehman common stock, or purchased call options or sold put options referencing Lehman common stock between July 11, 2008 and September 14, 2008, inclusive, and who were damaged thereby. Excluded from the Class are Defendants and their respective officers, affiliates and directors, members of their immediate families and their legal representatives, heirs, successors or assigns of any such excluded party and any entity in which Defendants have or had a controlling interest.

2. Appointing Lead Plaintiff Alameda County Employees' Retirement Association and plaintiff Oklahoma Firefighters Pension and Retirement System as Class Representatives; and

3. Appointing Bernstein Litowitz Berger & Grossmann LLP and Kessler Topaz Meltzer & Check, LLP, as Class Counsel.

PLEASE TAKE FURTHER NOTICE that, pursuant to Pretrial Order No. 23, any opposing papers must be filed on or before March 2, 2012, and any reply papers must be filed on or before March 16, 2012.

Dated: February 3, 2012

BERNSTEIN LITOWITZ BERGER
& GROSSMANN LLP

/s/ David R. Stickney
DAVID R. STICKNEY

DAVID R. STICKNEY
BRETT M. MIDDLETON
JON F. WORM
12481 High Bluff Drive, Suite 300
San Diego, CA 92130
Tel: (858) 793-0070
Fax: (858) 793-0323
-and-
MAX W. BERGER
STEVEN B. SINGER
1285 Avenue of the Americas, 38th Floor
New York, NY 10019
Tel: (212) 554-1400
Fax: (212) 554-1444

KESSLER TOPAZ MELTZER & CHECK, LLP

/s/ David Kessler
DAVID KESSLER

DAVID KESSLER
JOHN A. KEHOE
KIMBERLY A. JUSTICE
JOHN GROSS
MICHELLE NEWCOMER
RICHARD A. RUSSO, JR.
280 King of Prussia Road
Radnor, PA 19087
Tel: (610) 667-7706
Fax: (610) 667-7056

Co-Lead Counsel for Plaintiffs